



Lyndon B. Johnson Space Center
2101 NASA Parkway
Houston, Texas 77058-3696

July 19, 2007

Reply to Attn of: **AL-07-095**

TO: Distribution

FROM: AL/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance of JSC Employees with Senior Institutional or Project Responsibilities at an STS-118 Pre-Launch Reception Sponsored by Pratt & Whitney Rocketdyne

In accordance with 5 C.F.R. § 2635.204(g)(2) and (3), I make the following determination:

Certain JSC employees with senior institutional or project responsibilities have been invited to attend a pre-launch reception sponsored by Pratt & Whitney Rocketdyne at the Hilton Cocoa Beach Oceanfront Hotel in Cocoa Beach, Florida, on or about Tuesday, August 7, 2007, from 8:00 p.m. to 11:00 p.m. This event is to be held in conjunction with the launch of STS-118, at the Kennedy Space Center.

This event is a widely-attended gathering of NASA and other Federal officials, representatives from the aerospace industries, and members of the public. The reception is valued at \$25 per person and approximately 300 individuals are expected to attend. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635(g)(2).

Pratt & Whitney Rocketdyne is a contractor company that is currently involved in the Space Shuttle program, the Constellation program, and other significant contractual matters relating to NASA. Some JSC personnel invited to attend this event, including the JSC Center Director and Space Shuttle Program Manager, presently or in the near future have duties that may substantially affect the interests of Pratt & Whitney Rocketdyne. These personnel are similarly situated in that they have senior institutional or project responsibilities that could significantly influence current or future contractual matters with Pratt & Whitney Rocketdyne.

I have determined that free attendance of these senior institutional and project leaders at this pre-launch reception is in the interest of the Agency because it will allow NASA employees to discuss NASA missions, such as STS-118, programs, and operations with other attendees. The attendance of these senior NASA employees at the event will help to raise NASA's profile with national and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information concerning its activities.

Given the purpose of the event, the alignment of the event's interests with NASA's, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the Agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, NASA employees in the positions identified above may accept free attendance at this pre-launch reception. They may also accept invitations for accompanying spouses or guests. Free attendance by employees whose duties do not substantially affect the sponsors is addressed in a separate determination.

Questions about this determination may be addressed to Nadalynn Jenkins at 281-483-1004.



Bernard J. Roan

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